

Appendix C: Required Records Review

Requirements for Historical Records Review for Initial Inventory Development under the LCRR (See Exhibit 4-1 from EPA's Guidance for Developing and Maintaining a Service Line Inventory (2022))

Type of Historical Records	Regulatory Requirement (citation)	Primary Uses for Inventory Development (Including but not limited to)
<p>Previous Materials Evaluation</p> <p>(Applicable only for Community Water Systems)</p>	<p>Water systems must use the information on lead and galvanized iron or steel that it identified under 40 CFR § 141.42(d) when conducting the inventory of service lines in its distribution system for the initial inventory (40 CFR §141.84(a)(3)).</p> <p>Under 40 CFR §141.42, water systems were required to identify and report to their state if certain construction materials were present in their distribution system in the early 1980s (USEPA, 1980). Under the 1991 Lead and Copper Rule (USEPA, 1991a), water systems were required to use this evaluation to identify a pool of targeted sampling sites that meet the tiering criteria for lead and copper tap monitoring and was sufficiently large enough to meet the required number of lead and copper tap samples.</p>	<ul style="list-style-type: none"> • Reporting construction materials present in their distribution systems. • Identifying LSL material for subset of sites that were used for lead and copper tap monitoring.
<p>Construction and Plumbing Codes and Records</p>	<p>Systems must review all construction and plumbing codes, permits, and existing records or other documentation which indicates the service line materials used to connect structures to the distribution system to identify service line materials for the initial inventory (40 CFR §141.84(a)(3)(i)).</p>	<ul style="list-style-type: none"> • Identify when LSLs were allowed/specified or banned from use. • Identify service areas most likely to have LSLs by home/building construction date and service line size. • Review construction and plumbing permits for identification of service line (customer and/or system-owned) and plumbing materials.

Type of Historical Records	Regulatory Requirement (citation)	Primary Uses for Inventory Development (Including but not limited to)
Water System Records	Systems must review all water system records, including distribution system maps and drawings, historical records on each service connection, meter installation records, historical capital improvement or master plans, and standard operating procedures, to identify service line materials for the initial inventory (40 CFR §141.84(a)(3)(ii)).	<ul style="list-style-type: none"> • Identify service line material for system-owned and customer-owned sides.
Distribution System Inspections and Records	Systems must review all inspections and records of the distribution system that indicate material composition of the service connections that connect a structure to the distribution system to identify service line materials for the initial inventory (40 CFR §141.84(a)(3)(iii)).	<ul style="list-style-type: none"> • Identify service line material for system- and customer-owned portions. • Verify construction and water system records.